

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

DALONTE WHITE,)	CASE NO. 1:17-cv-01165
)	
Plaintiff,)	JUDGE PAMELA A. BARKER
)	
v.)	MAGISTRATE JUDGE GREENBERG
)	
)	DEFENDANTS' JOINT RESPONSE
)	TO PLAINTIFF'S MOTION FOR
CITY OF CLEVELAND, et al.,)	LEAVE TO FILE SUMMARY
)	JUDGMENT MEMORANDA IN
Defendants)	EXCESS OF 20 PAGES (DOC. # 234)

Defendants hereby jointly respond to Plaintiff's motion (Doc. # 234) for leave to file summary judgment memoranda in excess of the 20-page limit imposed by LR 7.1(f) for cases on the standard track.

Defendants respectfully submit that any leave granted to Plaintiff should be proportional to the leave previously granted to Defendants.

There are five pending motions for summary judgment by Defendants; i.e., those of David Lam (Doc. # 191); Thomas Shoulders (Doc. # 193); John Kubas and David Santiago (Doc. # 195); City of Cleveland (Doc. # 197); and Robert Beveridge and Michael Schade (Doc. # 199).

Pursuant to leave of Court, three of Defendants' supporting memoranda exceeded the 20-page limit: i.e., the Court permitted the City five (5) additional pages, on February 20, 2020;

David Lam ten (10) additional pages, on April 6, 2020; and Thomas Shoulders ten (10) additional pages, on April 9, 2020.

Defendants oppose Plaintiff's request to the extent it is disproportionate to the leave granted to Defendants. A 75-page omnibus brief as proposed by Plaintiff would be too voluminous, and it would be more efficient and fair to file individual memoranda in response to the pending motions.

It is within this Court's discretion to enforce the page limitations in LR 7.1(f). *Martinez v. United States*, 865 F.3d 842, 844 (6th Cir. 2017) ("The local rules also provide that non-compliance is sanctionable at the judge's discretion").

Therefore, for the foregoing reasons, Defendants oppose Plaintiff's motion (Doc. # 234) to the extent it seeks page limits for summary judgment memoranda in excess of the pages permitted to Defendants.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing was filed electronically and that notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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